



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

SEP 16 2014

OFFICE OF
AIR, WASTE AND TOXICS

Ms. Barbara E. Ritchie
Associate Director, EHS Remediation
FMC Corporation
1735 Market Street
Philadelphia, Pennsylvania 19103

Re: Approval of Class I Post Closure Plan Modification for the Slag Pit Sump
FMC Corporation
EPA RCRA ID: IDD 07092 9518
FMC Operable Unit of the Eastern Michaud Flats CERCLA Site

Dear Ms. Ritchie:

The U.S. Environmental Protection Agency Region 10 has reviewed your request for the EPA approval of a Class 1 modification to FMC's Resource Conservation and Recovery Act (RCRA) Post Closure Plan for the Slag Pit Sump dated, February 3, 2005.

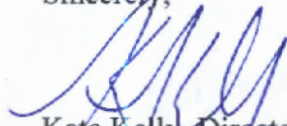
On September 5, 2014 the EPA's CERCLA Program approved, with modifications, the July 2014 FMC Engineering Design and Remedial Action Work Plan for site-wide grading. These July 2014 documents were submitted under the Unilateral Administrative Order (UAO) issued by the EPA in 2013 to implement the Interim Record of Decision Amendment (IROIDA) of 2012 for the FMC Operable Unit of the Eastern Michaud Flats Superfund Site.

The grading is designed to prevent run-on and to drain precipitation laterally off the soil cap to be installed next field season. In order to implement the remedial action grading phase work approved under the UAO, the current Slag Pit Sump asphalt cap will be filled to the grade specified in the CERCLA Remedial Design (RD). Since the asphalt cap will be covered, as specified in the CERCLA RD, inspection of the asphalt cap required by the current slag pit sump closure plan will not be possible. As summarized in FMC's correspondence dated August 7, 2014 requesting modification to the Slag Pit Sump post closure plan, the specific requirement to monitor the asphalt cap is being replaced with inspection and maintenance of the area backfilled above the Slag Pit Sump. This monitoring is in addition to monitoring and maintenance for the interim remedy final soil cap. In addition to the changes in monitoring and maintenance of the asphalt cap, the settlement monument will not be available for inspection or settlement monitoring until the settlement monument is re-established on the soil cap surface to be constructed. Once the settlement monument for the slag pit sump area is re-established, settlement monitoring will be reset to annual measurement in accordance with the Slag Pit Sump Post Closure Plan.

The EPA hereby approves the modified Slag Pit Sump Post Closure Plan, dated August 2014, submitted by letter dated August 7, 2014.

Please contact Linda Meyer (206) 553-6636 or by e-mail at meyer.linda@epa.gov if you have any questions concerning this approval.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kate Kelly', is written over the word 'Sincerely,'.

Kate Kelly, Director
Office of Air, Waste and Toxics

cc: Kelly Wright, Shoshone-Bannock Tribes
Doug Tanner, Idaho DEQ